

I appreciate the commercial benefits of the RFID technology in general. But I am concerned with the implications of the requested change in rules should the technology become ubiquitous. Would every package in every postal, delivery, and messenger truck become a data rf transmitter? That could be a tremendous boost for commerce, but also a significant source of interference to existing services. Does the suggested rule change take such success into account? I am not convinced that it does. I urge the commission to assume this service will become widespread and take the appropriate steps to separate it from existing services.

Also, I am not convinced that the proposed rules change is required in order to meet the requested enhancements to the RFID system in question. Primarily I believe there are other portions of the spectrum which are already allocated to this type of use. And secondly, I think other data transfer technologies could be explored which would further limit the potential for interference. For example, different power levels could be used for long and short transmissions. Or the longer data transmissions could take place on alternate frequencies or in rf enclosed spaces. Shorter transmissions used for locating a particular tag unit could remain as they are under the current rules.